

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
KNEPPER & CLARK LLC  
5510 So. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148  
Phone: (702) 856-7430  
Fax: (702) 447-8048  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
Email: dkrieger@hainesandkrieger.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RODNEY MOTT,  
Plaintiff,

TRINITY FINANCIAL SERVICES, LLC;  
and TROJAN CAPITAL INVESTMENTS,  
LLC.

### Defendants.

## TROJAN CAPITAL INVESTMENTS, LLC.

## Counterclaimant,

V.

RODNEY MOTT,

## Counterdefendant.

Case No. 2:16-cv-01949-JCM-CWH

**STIPULATION AND ORDER  
TO EXTEND TIME FOR PLAINTIFF TO  
FILE REPLY IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT AND  
MOTION FOR JUDGMENT ON THE  
PLEADINGS, AND FOR DEFENDANTS TO  
FILE RESPONSES TO PLAINTIFF'S  
MOTION TO STRIKE AND FOR  
SANCTIONS**

[FIRST REQUEST]

Complaint filed: August 16, 2016

1 Plaintiff Rodney Mott (“Plaintiff”), by and through his counsel of record, and Defendants  
2 Trinity Financial Services, LLC; and Trojan Capital Investments, LLC (“Defendants”)  
3 (collectively, the “Parties”) have agreed and stipulated to the following:  
4

5 1. On January 8, 2020, Plaintiff filed his Motion for Partial Summary Judgment. [ECF  
6 Dkt. 193]

7 2. On January 8, 2020, Plaintiff also filed his Motion for Judgment on the Pleadings.  
8 [ECF Dkt. 193]

9 3. On January 8, 2020, Defendants filed their Motion for Summary Judgment. [ECF  
10 Dkt. 189]

11 4. On January 10, 2020, the Court granted the Parties’ stipulation for an extension of  
12 time in connection with Plaintiff’s Motion for Judgment on the Pleadings. [ECF Dkt. 200]

13 5. On January 29, 2020, the Parties filed their respective Responses to Summary  
14 Judgment. [ECF Dkt. 201, 204]

15 6. On January 29, 2020, Plaintiff filed Motions to Strike and for Sanctions. [ECF Dkt.  
16 205, 206]

17 7. The Parties’ present summary-judgment Reply deadlines are February 12, 2020,  
18 and Plaintiff’s Reply deadline for his Motion for Judgment on the Pleadings is February 5, 2020.  
19 Defendants’ Response deadlines to Plaintiff’s Motions to Strike and for Sanctions is February 12,  
20 2020.

21 The Parties have agreed to extend time for the Parties to file their replies because Plaintiff’s  
22 counsel has a major appellate opening brief due February 5, 2020, and will be in San Francisco for  
23 an oral argument on February 12. The Parties have also agreed that extending Defendants’ time  
24 to respond to Plaintiff’s Motions to Strike and for Sanctions will assist in coordination of motion  
25 practice.

1 As a result, both the Parties hereby request this Court to further extend the date for the  
2 Parties to file (1) their Replies in Support of Motion for Summary Judgment, and (2) Plaintiff's  
3 Reply in support of his Motion for Judgement on the Pleadings, and (3) Defendants' Responses to  
4 Plaintiff's Motions to Strike and for Sanctions, until **February 17, 2020**.

5 This stipulation is made in good faith, is not interposed for delay, and is not filed for an  
6 improper purpose  
7

8 **IT IS SO STIPULATED.**

Dated January 31, 2020

<p>9 <b>KNEPPER &amp; CLARK LLC</b></p> <p>10 <u>/s/ Miles N. Clark</u></p> <p>11 Matthew I. Knepper, Esq. Nevada Bar No. 12796</p> <p>12 Miles N. Clark, Esq. Nevada Bar No. 13848</p> <p>13 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com</p> <p>16 <b>HAINES &amp; KRIEGER LLC</b></p> <p>17 David H. Krieger, Esq. Nevada Bar No. 9086</p> <p>18 8985 S. Eastern Avenue, Suite 350 Las Vegas, NV 89123 Email: dkrieger@hainesandkrieger.com</p> <p>20 <i>Counsel for Plaintiff</i></p>	<p>9 <b>KOLESAR &amp; LEATHAM</b></p> <p>10 <u>/s/ Michael R. Brooks</u></p> <p>11 Michael R. Brooks, Esq. Nevada Bar No. 7287</p> <p>12 Matthew D. Whittaker, Esq. Nevada Bar No. 13281</p> <p>13 400 S. Rampart Blvd., Suite 400 Las Vegas, NV 89145 Email: mbrooks@klnevada.com Email: mwhittaker@klnevada.com</p> <p>16 <i>Counsel for Defendants</i> <i>Trinity Financial Services, LLC and Trojan</i> <i>Capital Investments, LLC</i></p>
--	---

21 **ORDER GRANTING**

22 **STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE REPLY IN SUPPORT**

23 **OF MOTION FOR SUMMARY JUDGMENT**

24 **IT IS SO ORDERED**

25   
26 UNITED STATES DISTRICT COURT JUDGE

27 DATED February 3, 2020.  
28